

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

JASMINE BROWN individually and on behalf  
of all others similarly situated,

Plaintiff,  
-against-

WALMART INC.,

Defendant.

Civil Action No. 2:19-cv-00569-JS-AKT

**STIPULATION**

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JAN 28 2020 ★

LONG ISLAND OFFICE

WHEREAS Plaintiff seeks to file an Amended Complaint, which she shared with Defendant on January 15, 2020;

WHEREAS Defendant Walmart Inc. intends to file a letter requesting a pre-motion conference for leave to dismiss the Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED, by and among their undersigned counsel for the parties, that:

1. Plaintiff is permitted to file her Amended Complaint;
2. By entering into this stipulation Defendant does not concede that the Amended Complaint would be legally sufficient or meritorious and does not waive its right to move against it on any applicable grounds, Defendant also does not waive any argument that claims against Walmart Inc.'s Great Value Cinnamon Graham Cracker Product are dismissed with prejudice from this case; and
3. A facsimile or copy of a signature hereto shall have the same force and effect as an original.

Dates: January 27, 2020

SHEEHAN & ASSOCIATES, P.C.

By: /s/ Spencer Sheehan (on consent)  
Spencer Sheehan  
505 Northern Boulevard, Suite 311  
Great Neck, NY 11021  
Tel. 516-303-0552  
[spencer@spencersheehan.com](mailto:spencer@spencersheehan.com)

*Attorneys for Plaintiff*

FOLEY & LARDNER LLP

By: /s/ Sara P. Madavo  
Sara P. Madavo  
90 Park Avenue  
New York, NY 10128  
Tel.: 212-338-3582  
[smadavo@foley.com](mailto:smadavo@foley.com)

*Attorneys for Defendant Walmart Inc.*

**SO ORDERED**

/s/ A. Kathleen Tomlinson

**A. Kathleen Tomlinson**  
**United States Magistrate Judge**

Date: Jan. 28 20 20  
**Central Islip, N.Y.**